

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: STEPHANIE KAY KRUPIN Debtor	:	CHAPTER 13
	:	
	:	
VFS XANTHOS, LLC	:	
Movant	:	
	:	
vs.	:	
	:	
STEPHANIE KAY KRUPIN	:	
Debtor	:	
	:	
and	:	
	:	
CHARLES J. DEHART, III, ESQUIRE	:	
STANDING CHAPTER 13 TRUSTEE	:	CASE NO. 5-18-bk-04321-JJT

TRUSTEE’S ANSWER TO MOTION FOR RELIEF
FROM THE AUTOMATIC STAY

AND NOW, this 7th day of February, 2019, comes Charles J. DeHart, III, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, by his attorney, Agatha R. McHale, and avers:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied in that the Trustee does not have sufficient information to form a belief as to the truth of the averment.
7. Denied in that the Trustee does not have sufficient information to form a belief as to the truth of the averment.
8. Denied as calling for a conclusion of law. If an answer is deemed needed, the bankruptcy schedules show that Movant’s interest is adequately protected by the equity in the property.
9. Denied in that the Trustee does not have sufficient information to form a belief as to the truth of the averments.

10. Denied as calling for a conclusion of law.

WHEREFORE, your Trustee respectfully prays this Honorable Court enter an Order denying the Stay, and permitting the Debtor or a Chapter 7 Trustee to sell the mortgaged premises and pay the lienholders and creditors from the sale proceeds accordingly.

Respectfully submitted:

Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Agatha R. McHale
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 7th day of February, 2019, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Stephanie Kay Krupin
3545 High Crest Road
Canadensis, PA 18325

James Warmbrodt, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee